

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LA DOLCE VITA FINE DINING COMPANY  
LIMITED and LA DOLCE VITA FINE DINING  
GROUP HOLDINGS LIMITED,

Petitioners,

- v. -

ZHANG LAN,

Respondent,

- and -

APEX LEAD INVESTMENT HOLDINGS  
LIMITED,

Intervenor-Respondent.

Case No.: 1:19-mc-00536-ALC

**ECF Case**

**DECLARATION OF ERIC B. FISHER**

I, Eric. B. Fisher, declare as follows:

I am a partner with Binder & Schwartz LLP, counsel for Respondent Zhang Lan (“Zhang”) in the above-captioned action. I submit this declaration in support of Zhang’s memorandum of law in opposition to the motion of La Dolce Vita Fine Dining Company Limited and La Dolce Vita Fine Dining Group Holdings Limited to confirm the *ex parte* order of attachment issued by this Court dated November 21, 2019.

1. Attached hereto as **Exhibit A** is a true and correct copy of the transcript of the May 15, 2015 hearing in the case of *Harbour Victoria Inv. Holdings Ltd. v. Chawla*, 1:15-cv-03212-LTS (S.D.N.Y.) (ECF No. 46).

2. Attached hereto as **Exhibit B** is a true and correct copy of the Petition to Confirm Foreign Arbitral Awards and for Entry of Judgment, ECF No. 1, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 21-cv-03178 (S.D.N.Y. Apr. 13, 2021).

3. Attached hereto as **Exhibit C** is a true and correct copy of a letter from Steven B. Feigenbaum to the Hon. Mary Kay Vyskocil, dated May 4, 2021, filed in *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, Case No. 21-cv-03178 (S.D.N.Y.).

4. Attached hereto as **Exhibit D** is a true and correct copy of a letter from Steven B. Feigenbaum to the Hon. Mary Kay Vyskocil, dated June 11, 2021, filed in *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, Case No. 21-cv-03178 (S.D.N.Y.).

5. Attached hereto as **Exhibit E** is a true and correct copy of the Post-Conference Scheduling Order, ECF No. 36, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 21-cv-03178 (S.D.N.Y. June 8, 2021).

6. Attached hereto as **Exhibit F** is a true and correct copy of the Order, ECF No. 42, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 21-cv-03178 (S.D.N.Y. July 26, 2021).

7. Attached hereto as **Exhibit G** is a true and correct copy of the Stipulation & Order of Voluntary Dismissal Without Prejudice, ECF No. 46, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 21-cv-03178 (Aug. 6, 2021).

8. Attached hereto as **Exhibit H** is a true and correct copy of a letter from Steven B. Feigenbaum to the Hon. Mary Kay Vyskocil, dated August 6, 2021, filed in *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, Case No. 21-cv-03178 (S.D.N.Y.).

9. Attached hereto as **Exhibit I** is a true and correct copy of the Petition to Confirm & Enforce Foreign Arbitration Awards, ECF No. 1, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 23-cv-06273 (S.D.N.Y. July 20, 2023).

10. Attached hereto as **Exhibit J** is a true and correct copy of a letter from Jack B. Gordon to the Hon. Edgardo Ramos, dated September 28, 2023, filed in *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, Case No. 23-cv-06273 (S.D.N.Y.).

11. Attached hereto as **Exhibit K** is a true and correct copy of a letter from Jack B. Gordon to the Hon. Andrew L. Carter, Jr., dated November 29, 2023, filed in *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, Case No. 23-cv-06273 (S.D.N.Y.).

12. Attached hereto as **Exhibit L** is a true and correct copy of Apex Lead Investment Holdings Limited's Notice of Motion to Dismiss Petition, ECF No. 35, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 23-cv-06273 (S.D.N.Y. Feb. 27, 2024).

13. Attached hereto as **Exhibit M** is a true and correct copy of Apex Lead Investment Holdings Limited's Memorandum of Law in Support of Motion to Dismiss, ECF No. 36, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 23-cv-06273 (S.D.N.Y. Feb. 27, 2024).

14. Attached hereto as **Exhibit N** is a true and correct copy of the Notice of Motion to Dismiss, ECF No. 37, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 23-cv-06273 (S.D.N.Y. Feb. 27, 2024).

15. Attached hereto as **Exhibit O** is a true and correct copy of the Memorandum of Law in Support of Motion to Dismiss Petition to Confirm & Enforce Foreign Arbitration Awards, ECF No. 38, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, 23-cv-06273 (S.D.N.Y. Feb. 27, 2024).

16. Attached hereto as **Exhibit P** is a true and correct copy of Apex Lead Investment Holdings Limited's Reply in Support of Motion to Dismiss, ECF No. 43, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, No. 23-cv-06273 (S.D.N.Y. Mar. 26, 2024).

17. Attached hereto as **Exhibit Q** is a true and correct copy of the Reply Memorandum of Law in Further Support of Motion to Dismiss Petition to Confirm & Enforce Foreign Arbitration Awards, ECF No. 44, *La Dolce Vita Fine Dining Co. Ltd. v. Zhang*, No. 23-cv-06273 (S.D.N.Y. Mar. 26, 2024).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 10, 2025

/s/ Eric B Fisher  
Eric B. Fisher